

National Aeronautics and Space Administration  
Kennedy Space Center  
Kennedy Space Center, FL 32899



January 19, 2011

Reply to Attn of:

CC-A

TO: Distribution

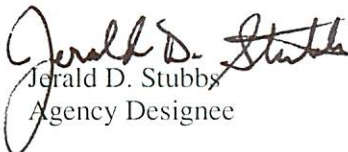
FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the 40<sup>th</sup>  
Anniversary Celebration of Apollo 14, January 29, 2011.

The Astronaut Scholarship Foundation (ASF), a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host the 40<sup>th</sup> Anniversary Celebration of Apollo 14 at the Kennedy Space Center Visitor Complex's Apollo Saturn V Center on January 29, 2011. The Gala will honor Apollo 14 crewmembers Edgar Mitchell and the late Alan Shepard and Stuart Roosa. Several other Apollo astronauts will be in attendance such as Neil Armstrong, Alan Bean, Gene Cernan (Apollo 14 Backup Commander), Walt Cunningham, Fred Haise (Apollo 14 CapCom), James Lovell, Bruce McCandless (Apollo 14 CapCom), Rusty Schweickart, Dave Scott, Tom Stafford and Al Worden. Invitees include corporate and industry executives and workers, members of academia, aerospace contractors, community leaders, Federal Government officials, military leaders and other space enthusiasts. The estimated cost of the dinner is \$80 per person.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having NASA employees attend these events. Through attendance, NASA employees will be able to honor and show support for the astronauts and NASA's historic programs. In addition, these events are a forum for the attendees to disseminate information on NASA's ongoing activities and to discuss matters of interest to NASA with a diverse group of fellow attendees.

Accordingly, NASA employees whose duties do not substantially affect any of the sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under the Executive Order 13490, may accept an invitation for free attendance at the event for themselves. NASA employees whose duties may substantially affect ASF, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in these events from the Chief Counsel's Office.

  
Gerald D. Stubbs  
Agency Designee

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